

EXHIBIT A

THE HONORABLE JUSTIN L. QUACKENBUSH

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

PLUMBERS UNION LOCAL NO. 12
PENSION FUND, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

AMBASSADORS GROUP INC., et al.,

Defendants.

No. 2:09-cv-00214-JLQ

CLASS ACTION

DECLARATION OF JOY ANN BULL
IN RESPONSE TO INTERIM
MEMORANDUM DATED
FEBRUARY 28, 2012

1 I, JOY ANN BULL, declare as follows:

2 1. I am a member of the firm of Robbins Geller Rudman & Dowd LLP. I
3 submit this Declaration pursuant to the Court's February 28, 2012 Order.

4 2. **Hours Worked:** The Court has stated its concerns about the number of
5 hours I worked on the settlement of this matter. I have reviewed all of my time entries
6 and all but one entry is accurate. During the workday my practice is to make notes
7 about time spent on post-it notes and handwrite them onto the form provided by the
8 firm at the end of each day. The data from those forms is then entered into our
9 computer system. I receive my time entries following the end of each month for
10 review. For the reason explained below, I did not review my time for accuracy at the
11 end of May 2011. In reviewing my time now, I see that there is an entry for one hour
12 on May 23, 2011. That entry is likely an error as I do not recall working at all on that
13 date. The entry likely belongs on a different day, but at this point I cannot determine
14 the appropriate day. Therefore, that time should be eliminated from my submission. I
15 apologize for not noticing this error earlier.

16 3. The amount of time I worked on this case might be explained by events
17 taking place in my personal life during the time period I documented the settlement.
18 Beginning in 2010 and continuing in 2011, I carried a reduced workload as my
19 husband of 43 years was in and out of the hospital continually fighting and ultimately
20 losing his 6 year battle with lymphoma. In April 2011, when I started working on this
21 case, my husband was undergoing treatment 3 times a week, continually seeing
22 various specialists and was in and out of the hospital 3 or 4 times in April and May.
23 He passed away on May 23, 2011. I continued to work on this case to complete the
24 settlement documentation, obtain entry of the notice order, and submit final approval
25 papers. In retrospect, I am sure I was distracted and not at my best. Under different
26 circumstances, I would likely have completed my work more efficiently.

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DECLARATION OF JOY ANN
BULL IN RESPONSE TO INTERIM
MEMORANDUM DATED 02/28/12
(2:09-cv-00214-JLQ)

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1 4. **Expenses:** I made several oversights in my October 26, 2011
2 Declaration (ECF 181).

3 5. First, my firm's current standard form for expense declarations says
4 "Expense Category" where ECF 181 at p.3 said "Disbursement." I did not notice this
5 discrepancy until the Court pointed it out at the November 30, 2011 hearing.
6 Compounding that mistake was my failure to add a notation that in-house
7 consultants/investigators were included at their market rates versus their actual
8 compensation.

9 6. Second, I did not notice that "Forensic Accountants" was listed under in-
10 house expenses instead of the correct entry of "Economic Damage Analysts." The
11 initial entry should have read "Economic Damage Analysts at the market rate of
12 \$14,770." I discovered this mistake when I asked payroll personnel to provide me
13 with the actual compensation for each individual covered by in-house
14 consultants/investigators. I addressed the category entry in my Supplemental
15 Declaration (ECF 196).

16 7. In my Supplemental Declaration (ECF 196), I reduced the amount of
17 expenses for in-house personnel (as requested by the Court at the November 30, 2011
18 hearing) from their market rates to my best calculation of actual compensation they
19 receive. No other expenses were changed or reduced. The result was a reduction
20 from \$223,095.46 to \$114,137.21 in expenses.

21 8. Finally, while mistakes were made, I did not intend to mislead the Court
22 in any way.

23 I declare under penalty of perjury that the foregoing is true and correct.
24 Executed this 16th day of March, 2012, at San Diego, California.

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26 

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